

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CG3 MEDIA, LLC and COREY
GRIFFIN,

Plaintiffs / Counter-Defendants,

-v-

BELLEAU TECHNOLOGIES, LLC,

Defendant / Counter-Plaintiff.

Civil Action No. 1:21-cv-04607-MKV

**BELLEAU TECHNOLOGIES, LLC’S NOTICE OF
MOTION FOR PRELIMINARY INJUNCTION**

PLEASE TAKE NOTICE that Defendant / Counter-Plaintiff Belleau Technologies LLC’s (“Belleau”), by and through its undersigned counsel and pursuant to (a) Federal Rule of Civil Procedure 65 and (b) 35 U.S.C § 283, hereby moves this Court for a preliminary injunction:

(a) Enjoining Plaintiffs Corey Griffin and CG3 Media, LLC (“Plaintiffs”), their employees, agents, subsidiaries, affiliates, parents, successors, assigns, officers, servants, attorneys, and any other person in active concert or participation with them, from any conduct that infringes, directly or indirectly, U.S Patent No. 9,953,646 (the “’646 Patent”), including making, selling, distributing, marketing, testing, importing, offering to sell, or otherwise using their Speakflow software product– or any other software application infringing the ’646 Patent – within the United States;

(b) Enjoining Plaintiffs from taking any public or private position that is contrary to the Court’s order;

(c) Requiring Plaintiffs to take down speakflow.com and to remove all marketing materials, postings, and social media accounts about Speakflow;

and (d) Granting Belleau such other and further relief as this Court deems just and proper.

This motion is based on the accompanying Memorandum of Law in Support of Belleau Technologies LLC's Motion for Preliminary Injunction, the Declaration of Bryon Wasserman, the Declaration of Jason Frankovitz, the Declaration of Jeremy Sadkin, all exhibits thereto, all pleadings in this action, and any additional oral or documentary evidence as may be received prior to or at a hearing on this Motion.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Civil Rule 6.1(b), any opposing affidavits and answering memoranda must be served within fourteen days after service of these moving papers.

Dated: November 14, 2022
New York, New York

Respectfully submitted,

By: /s/ Etai Lahav
Etai Lahav
Bryon Wasserman (*pro hac vice*)
RADULESCU LLP
5 Penn Plaza, 19th Floor
New York, NY 10001
646-502-5950
etai@radip.com
bryon@radip.com

*Attorneys for Defendant/Counter-Plaintiff
Belleau Technologies LLC*

CERTIFICATE OF SERVICE

I hereby certify that on November 14, 2022, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/Etai Lahav

Etai Lahav